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WRITER'S DIRECT DIAL NUMBER (202) 626-3910
WRITER'S E-MAIL ADDRESS DSTEWART@ROPESGRAY.COM

July 20, 2000

Via Courier

Jeff S. Jordan
Office of the General Counsel
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Re: Response to Complaint, MUR 5020
Harrah's Entertainment, Inc. and Mr. Herbert Wolfe

Dear Mr. Jordan:

This letter, on behalf of Harrah's Entertainment, Inc. and Mr. Herbert Wolfe, responds to the complaint of Audrey L. Michael dated May 18, 2000. The complaint alleges that the respondents violated 2 U.S.C. § 441a(a)(8) and 11 C.F.R. § 110.6(b) in connection with the unsuccessful campaign of State Sen. William Gormley for the Republican nomination for a U.S. Senate seat from New Jersey. These respondents respectfully deny any allegation of substantive violation of the federal election law, and request that the Federal Election Commission take no further action in this matter.

Through subsidiaries, Harrah's Entertainment owns two casinos in Atlantic City, New Jersey. Atlantic City Showboat, Inc., a subsidiary of Harrah's Entertainment, Inc., operates a casino under New Jersey license. Marina Associates, a partnership of two subsidiaries of Harrah's Entertainment, Inc., operates and holds the license for the Harrah's Atlantic City casino. Respondent Herbert Wolfe manages the Showboat property

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and David Jonas is general manager of the casino licensed to Marina Associates.¹

In March 2000, following a personal request for support from the Gormley campaign, Messrs. Wolfe and Jonas each told certain business colleagues that they planned to contribute to the Gormley for Senate committee, and invited various colleagues to do the same. In doing so, they acted in their individual capacities, and not on behalf of, or at the behest of, the businesses they manage. The federal election laws permit individuals acting in their personal capacity to collect and distribute funds earmarked for federal candidates. See 11 C.F.R. § 110.6(b)(2)(ii) (forbidding the collection and distribution of earmarked funds only by entities prohibited from making direct contributions). An individual's association with a corporation does not convert his personal political activities into actions of the corporation. As a convenience, a number of personal contribution checks were delivered to the offices of Mr. Wolfe and Mr. Jonas, respectively, and Gormley campaign representatives picked up each group of checks. The personal actions of Messrs. Wolfe and Jonas did not cause Harrah's Entertainment, Inc. to violate the prohibitions applicable to corporations.

By dint of their activity in support of the Gormley campaign, we have concluded that Mr. Wolfe and Mr. Jonas each should have filed a conduit report, as provided in 11 C.F.R. § 110.6(c). Accordingly, such reports are being filed simultaneously with this response, and copies of those reports are attached to this letter (Attachments A and B). Both Mr. Wolfe and Mr. Jonas understood that the Gormley committee would manage the necessary public reporting of the contributions. Indeed, they first learned of the conduit reporting requirement only after learning of Ms. Michael's complaint. Our best current information is that such donations were reported correctly by the Gormley committee.

The Gormley committee received accurate information about each contributor at the time it collected the contributions from Mr. Wolfe. Mr. Wolfe provided to contributors a form from the Gormley committee that included space for name, occupation, and home address. The contributions were made by personal checks, which also would include the name and address of each contributor. The checks were made payable to the Gormley for

¹ David Jonas was not named in Ms. Michael's complaint and is not a respondent in this proceeding.

ROPES & GRAY

Jeff S. Jordan

-3-

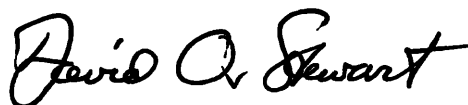
July 20, 2000

Senate committee. Therefore, the committee was informed who made each contribution and that each was intended for the campaign.

In the case of Mr. Jonas, he provided to the Gormley campaign both personal checks made out to the campaign by contributors, plus -- in response to a request by the Gormley committee -- a list of those who had delivered such checks to him. Accordingly, the campaign received full and proper information about those contributions, as well.

The respondents therefore deny all allegations of wrongdoing, and the late filing of the conduit reports was unintentional. In view of the good faith of Messrs. Wolfe and Jonas, further action by the Commission is not warranted in this case.

Sincerely,



David Overlock Stewart
Ashley N. Bailey

Enclosures

DOS/bw:MHODMA Wash,7092811,4

cc: D. Gallagher, Esq.
H. Wolfe

25.04.2023

ATTACHMENT A

ROPES & GRAY
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July 20, 2000

Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Re: Conduit Report

Dear Sir or Madam:

I write to submit a conduit report, pursuant to 11 C.F.R. § 110.6(c), on behalf of Herbert Wolfe of Abescon, New Jersey, in connection with the unsuccessful campaign of State Sen. William Gormley for the Republican nomination for U.S. Senate from New Jersey.

The individuals listed in the attached table contributed to the Gormley for Senate committee in March 2000 after Mr. Wolfe invited them to do so. Mr. Wolfe did not then compile a list of contributors. Therefore, the information in the attached table is based on records kept by the Gormley for Senate committee. Mr. Wolfe believes that many of the listed contributors delivered their checks to his office suite during the last two weeks of March 2000. Mr. Wolfe further believes that a few of the contributors delivered their contributions directly to the Gormley campaign. The Gormley for Senate committee collected all checks held by Mr. Wolfe on or about March 30. All contributions were made by personal check of the contributor, with all checks made payable to the Gormley for Senate committee. All other information required by regulation is provided in the attached

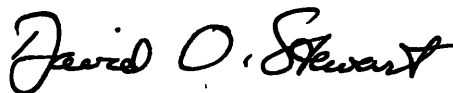
ROPES & GRAY

Federal Election Commission -2-

July 20, 2000

table, and comparable information was provided to the Gormley for Senate committee at the time it received the contributions.

Sincerely,



David Overlock Stewart

Enclosure

DOS/bw:MHODMA Wash;7094015,1

cc: H. Wolfe (w/encl.)

11/11/00 11:11 AM

CONDUIT REPORT: HERBERT WOLFE

CONTRIBUTOR	ADDRESS	OCCUPATION	EMPLOYER	AMOUNT
Ashman, George	608 North Somerset Avenue Ventnor, NJ 08406	Manager	Atlantic City Showboat, Inc.	\$500.00
Blumberg, Jil	8336 Westfair Circle S. Memphis, TN 38138	Vice President	Atlantic City Showboat, Inc.	\$1,000.00
Cartlidge, Elizabeth	124 Saint Andrews Drive Egg Harbor Township, NJ	Executive	Atlantic City Showboat, Inc.	\$1,000.00
Colasante, Nicholas	400 South Stockbridge Court Absecon, NJ 08201	Director	Atlantic City Showboat, Inc.	\$500.00
Custo, John, Jr.	720 North Victoria Street Ventnor City, NJ 08406	Marketing	Atlantic City Showboat, Inc.	\$500.00
Green, Thomas	1101 Sheridan Boulevard Brigantine, NJ 08203	Director	Atlantic City Showboat, Inc.	\$500.00
Hoffman, Andrew	1105 Plymouth Avenue Absecon, NJ 08201	Director	Atlantic City Showboat, Inc.	\$250.00
Joyce, William	209 Aberdeen Road Williamstown, NJ 08094	Director	Atlantic City Showboat, Inc.	\$250.00
Krawiec, Gregory	7005 Black Horse Pike West Atlantic City, NJ 08232	Vice President	Atlantic City Showboat, Inc.	\$1,000.00
Lewis, Keami	35 Wilson's Landing Road Sicklerville, NJ 08201	Director	Atlantic City Showboat, Inc.	\$500.00

CONDUIT REPORT: HERBERT WOLFE

CONTRIBUTOR	ADDRESS	OCCUPATION	EMPLOYER	AMOUNT
Lifshin, Rosaly	1918 Ferndale Drive Ocean City, NJ 08226	Vice President	Atlantic City Showboat, Inc.	\$1,000.00
McClinton, Doris	45 North Massachusetts Ave. Ventnor City, NJ 089401	Director	Atlantic City Showboat, Inc.	\$250.00
Perkins, Harvery	13 North View Drive Somer Point, NJ 08244	Executive	Atlantic City Showboat, Inc.	\$1,000.00
Reale Scaffidi, Victoria	4572 Post Road Vineland, NJ 08360	Marketing	Atlantic City Showboat, Inc.	\$500.00
Sausto, James	301 Lake Chaplain Drive Little Egg Harbor, NJ 08087	Director	Atlantic City Showboat, Inc.	\$500.00
Surkin, Hershey	640 B Palmer Lane Yardley, PA 19067	Executive	Atlantic City Showboat, Inc.	\$500.00
Wolfe, Herbert	12 Cavesson Drive Absecon, NJ 08201	President	Atlantic City Showboat, Inc.	\$1,000.00

2010.04.12.09

ATTACHMENT B

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July 20, 2000

Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Re: Conduit Report

Dear Sir or Madam:

I write to submit a conduit report, pursuant to 11 C.F.R. § 110.6(c), on behalf of David Jonas of Medford, New Jersey, in connection with the unsuccessful campaign of State Sen. William Gormley for the Republican nomination for U.S. Senate from New Jersey.

The individuals listed in the attached table contributed to the Gormley for Senate committee after Mr. Jonas invited them to do so. As a matter of convenience, during the last two weeks of March 2000, the contributors delivered their contribution checks to Mr. Jonas' office suite. A representative of the Gormley for Senate committee picked up the checks on March 29. All contributions were made by personal check of the contributor, and all checks were made payable to the Gormley for Senate committee. All other information required by regulation is provided in the attached table, and comparable information was provided to the Gormley for Senate committee on March 30, 2000.

Sincerely,



David Overlock Stewart

Enclosure

DOS/bw:MHODMA Wash,7094017,1
cc: D. Jonas

CONDUIT REPORT: DAVID JONAS

CONTRIBUTOR	ADDRESS	OCCUPATION	EMPLOYER	AMOUNT
Ambrosio, William	5 Ashbridge Lane Linwood, NJ 08221	Games Shift Manager	Marina Associates	\$500.00
Baumann, Ronald	805 Blue Teal Dr. Absecon, NJ 08201	Vice President of Food & Beverage	Marina Associates	\$1000.00
Booker, Michael	211 East Briarwood Lane Absecon, NJ 08201	Slot Shift Manager	Marina Associates	\$300.00
Boxer, Christine	43 Jensen Court Mays Landing, NJ 08330	Slot Shift Manager	Marina Associates	\$500.00
Byrnes, James	215 Steven Drive Linwood, NJ 08221	Director of Casino Marketing	Marina Associates	\$500.00
Campano, Holly	2109 West Avenue Linwood, NJ 08221	Database & Direct Mail Manager	Marina Associates	\$250.00
Carlucci, Anthony	801 Seaside Ave. Absecon, NJ 08201	Beverage Manager	Marina Associates	\$100.00
Chiaradio, Jeanne	134 North New York Road Absecon, NJ 08201	Casino Manager	Marina Associates	\$500.00
Ciallrella, Anthony	318 East Spencer Lane Absecon, NJ 08201	Games Shift Manager	Marina Associates	\$500.00
Cleary, James	532 East Jimmie Leeds Road Absecon, NJ 08201	Vice President of Hotel Operations	Marina Associates	\$1,000.00

CONDUIT REPORT: DAVID JONAS

CONTRIBUTOR	ADDRESS	OCCUPATION	EMPLOYER	AMOUNT
Cook, Thomas	2201 Brighton Drive Linwood, NJ 08221	Vice President of Slot Operations	Marina Associates	\$1,000.00
Cunningham, Glen	513 Hilltop Drive Absecon, NJ 08201	Games Shift Manager	Marina Associates	\$500.00
Curley, Karen	8 Bramble Drive Brigantine, NJ 08203	Convention Services & Banquet Manager	Tropicana Casino & Entertainment Resort	\$500.00
DeNafo, Alfred	2214 Zion Road Northfield, NJ 08225	Slot Shift Manager	Marina Associates	\$500.00
Evrensel, Doris Evrensel, Berk	243 E. Coleman Pl. Absecon, NJ 08201	Volume Restaurant Manager EVS Manager	Marina Associates	\$200.00
Fetcho, LuAnn	306 W. Royal Avenue Linwood, NJ 08221	Division Director of Direct Marketing	Harrah's Eastern Operations Division	\$250.00
Grahslar, Kimberly	547 Lafayette Blvd. Brigantine, NJ 08203	Volume Restaurant Manager	Marina Associates	\$75.00
Gullo, Gaye	131 East Oakcrest Ave. Northfield, NJ 08225	Division Vice President of Marketing	Harrah's Eastern Operations Division	\$1,000.00
Guzman, Arlene	206 Washington Avenue Egg Harbor Township, NJ	Manager of Materials	Marina Associates	\$250.00

CONDUIT REPORT: DAVID JONAS

CONTRIBUTOR	ADDRESS	OCCUPATION	EMPLOYER	AMOUNT
Herman, Donna	P. O. Box 1227 Brigantine, NJ 08203	Manager of Customer Development	Marina Associates	\$250.00
Holloman, Ronald	202 East Colman Place Absecon, NJ 08201	Director of Internal Audit	Marina Associates	\$250.00
Holl, Wendy	8 Starboard Court Atlantic City, NJ 08401	Executive Assistant	Harrah's Eastern Operations Division	\$100.00
Jonas, David	1 Sweet Gum Court Medford, NJ 08055	Sr. Vice President & General Manager	Marina Associates	\$1,000.00
Kashuda, Mark	908 Ridgewood Drive Northfield, NJ 08225	Slot Shift Manager	Marina Associates	\$500.00
King, Karen	413 North Harvard Ave. Ventnor, NJ 08406	Financial Controller	Marina Associates	\$250.00
Kotzen, Susan	817 North Surrey Ave. Ventnor City, NJ 08406	Director of Public Affairs	Marina Associates	\$250.00
Mallett, Mark	19 Romney Place Cape May Court House, NJ 08210	Director of Strategic Planning & Analysis	Marina Associates	\$250.00
McFadden, Charles	8 Lakeview Lane Sewell, NJ 08080	Surveillance Director	Marina Associates	\$500.00

CONDUIT REPORT: DAVID JONAS

CONTRIBUTOR	ADDRESS	OCCUPATION	EMPLOYER	AMOUNT
Merrick, Paul	1714 Biden Lane Williamstown, NJ 08094	Stage Manager	Marina Associates	\$100.00
Miller, Janet	217 North Genoa Avenue Egg Harbor City, NJ 08215	Director of Systems & Technology	Marina Associates	\$500.00
Myers, Gail	300 Pond Road Egg Harbor Township, NJ 08234	Operations Controller	Marina Associates	\$250.00
Naranjo, Mylka	1313 Cedarbrook Avenue Millville, NJ 08332	Manager of Diversity & Employee Relations	Marina Associates	\$250.00
O'Hanley, Ross	1101 Bayshore Apt. 3B Brigantine, NJ 08203	President's Associate	Marina Associates	\$250.00
Paludi, Louis	1004 Bay Drive West Atlantic City, NJ 08330	Consultant	Self-employed	\$500.00
Pappas, LuAnn	P. O. Box 295 Cologne, NJ 08213	VP of Casino Marketing	Marina Associates	\$1000.00
Peditto, Linda	4728 Andonea Drive Mays Landing, NJ 08330	Dir. Teleservices/Yield Mgmt.	Marina Associates	\$250.00
Presha, Jeanne	504 Delview Road Cape May Beach, NJ 08251	Manager of Training & Development	Marina Associates	\$250.00

CONDUIT REPORT: DAVID JONAS

CONTRIBUTOR	ADDRESS	OCCUPATION	EMPLOYER	AMOUNT
Quigley, Frank	10 Luis Drive Egg Harbor Township, NJ 08234	Vice President of Table Games	Marina Associates	\$1,000.00
Ranere, John	17 Carroll Court Sicklerville, NJ 08081	Credit Manager	Marina Associates	\$250.00
Richter, Patricia	383 East Upland Avenue Absecon, NJ 08201	Director of Security	Marina Associates	\$250.00
Rocco, Patricia	4570 Catawba Avenue Mays Landing, NJ 08330	Director of Service Strategy	Marina Associates	\$500.00
Rodio, Anthony	665 Bellevue Avenue Hammonton, NJ 08037	Vice President of Finance	Marina Associates	\$1,000.00
Sanderson, Charlie	24 Luke Court Ocean View, NJ 08230	Slot Performance Manager	Marina Associates	\$500.00
Simpson, William	37 Jackson Avenue Northfield, NJ 08225	Chief Engineer	Marina Associates	\$100.00
Slickmeyer, Tina	12 Buckingham Way Mays Landing, NJ 08330	Manager of Junket Programs	Marina Associates	\$250.00
Starrett, Mark	112 Lisbon Avenue Absecon, NJ 08201	Player Services Manager	Marina Associates	\$250.00

CONDUIT REPORT: DAVID JONAS

CONTRIBUTOR	ADDRESS	OCCUPATION	EMPLOYER	AMOUNT
Strauss, Allen	3 Cambridge Townhouse Dr. Eggharbor Township, NJ 08234	Total Gold & Retail Marketing Mgr.	Marina Associates	\$250.00
Walsh, Michael	11 N. Coolidge Avenue, #5 Margate, NJ 08402	Housekeeping Manager	Marina Associates	\$150.00
Ward, Donna	1824 Cornus Court Williamstown, NJ 08094	Director Hotel Services	Marina Associates	\$50.00
Wheeler, Stephanie	122 Holly Road Absecon, NJ 08201	Vice President of Human Resources	Marina Associates	\$1,000.00
Wilmott, Timothy*		*Division President	Harrah's Eastern Operations Division N/A	\$1,000.00
Barna, Anastasia** (husband & wife)	552 Gravelly Run Road Mays Landing, NJ 08330	**Medical Doctor (not currently working)	--	\$1,000.00
Witmer, John	419 Nectar Avenue Absecon, NJ 08201	Director of Engineering & Maintenance	Marina Associates	\$500.00
Zappas, John	119 Lincoln Drive Brigantine, NJ 08203	Director of Restaurant Services	Marina Associates	\$100.00